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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Replacement of Part 90 by Part 88 to)
Revise the Private Land Mobile Radio)
Services and Modify the Policies)
Governing Them)
)
and)
)
Examination of Exclusivity and)
Frequency Assignment Policies of)
the Private Land Mobile Radio Services)

PR Docket No. 92-235

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

**MOTION OF SECURICOR RADIOCOMS
LIMITED FOR EXTENSION OF PAGE LIMITATION**

Securicor Radiocom Limited ("Securicor"), by its counsel, hereby moves, pursuant to Section 1.48(b) of the Commission's Rules, for an extension of the page limitation set forth in Section 1.429 of the Commission's Rules limiting petitions for reconsideration to 25 pages. This motion is filed at least ten days prior to the due date for the filing of petitions for reconsideration which are due on August 18, 1995. Securicor requests an extension of 40 pages to permit a filing of up to 65 pages.

In support of its request, Securicor suggests that the complex technical and policy issues addressed by the Commission in its Report and Order and Further Notice of Proposed Rule Making, FCC 95-255 (June 23, 1995) warrant an extension.¹ Such an extension would allow Securicor to raise and brief a number of important points for the Commission's consideration that

¹ See, e.g., In the Matter of Southwestern Bell Telephone Company, 2 FCC Rcd 3644, 3645 n.4 (motion for permission to exceed page limitation granted in part "because of the complexity of the issues involved").

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bear on its primary objective of enhancing spectrum efficiency in the Private Land Mobile Radio ("PLMR") services. This proceeding has spanned more than four years from the release of a Notice of Inquiry in PR Docket No. 91-170 to the issuance of the Report and Order. The Commission's own description underscores the complexity of the task:

Because of the many special characteristics of the private radio services, such as spectrum sharing and no-cost spectrum use, it has been particularly difficult to encourage spectrum efficiency in these bands. We seek, in this proceeding, to ensure the provision of essential private wireless services, and to provide marketplace incentives to enhance spectrum efficiency so as to satisfy PLMR demand well into the 21st century.²

The Report and Order, itself a sizable document, adopts "extensive changes to the PLMR service rules."³ The rules alone exceed more than 100 pages as published in the Federal Register.⁴ Comments, reply comments and ex parte filings totalling thousands of pages were submitted by many user groups, service providers, frequency coordinators and manufacturers. The Commission noted that "the spectrum in the frequency bands under consideration in this proceeding supports over 12 million transmitters with an aggregate value of \$25 billion dollars."⁵ Because the rules adopted by the Commission are so far-reaching and highly-technical in nature, Securicor respectfully requests that the provisions of Section 1.429 be relaxed so that it may fully present various issues for the Commission's reconsideration.

² Report and Order at 2.

³ Report and Order at 11.

⁴ 60 Fed. Reg. 37152-37277 (July 19, 1995).

⁵ Report and Order at 3 (footnote omitted).

In addition, Securicor intends to append an economic study and a technical analysis of the Commission's decision to its petition. Because these studies will contribute factual support to the petition, Securicor believes that they will not be counted towards the page limitation consistent with Section 1.48(a) of the Commission's Rules.⁶ Securicor, however, intends to confine the total number of pages in its Petition and appendices to that consistent with the extension of the page limitation requested herein.

The Commission has in the past recognized the volume and complexity of the comments filed in this proceeding in granting two extensions of time to file comments and replies.⁷ The Commission found that the public interest would be served by providing adequate time for interested parties to read and respond to comments filed so that the Commission would have at its disposal the fullest possible record on which to make decisions on all the issues involved in this proceeding. The same rationale underlies Securicor's request for an extension of the page limitation rule and should, therefore, be granted.

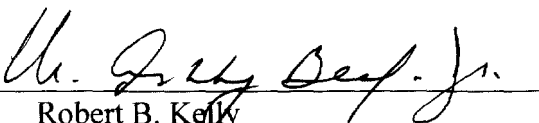
⁶ See In the Matter of Amendment of Sections 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry), 2 FCC Rcd 4211 (1987).

⁷ Replacement of Part 90 by Part 88 to Revise the Private Land Mobile Radio Services and Modify the Policies Governing Them, 8 FCC Rcd 4711 (1993)(Order Extending Reply Comment Period).

For the foregoing reasons, Securicor respectfully requests that the Commission grant its motion for extension of page limitation.

Respectfully Submitted,

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